

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

EDWARD S. ADAMS,
Defendant.

17-CR-64-DWF-KMM

**DEFENDANT'S MOTION TO
SEAL DOCUMENTS FILED
UNDER TEMPORARY SEAL**

Defendant Edward Adams in the above-captioned action has filed the following
under seal:

- Defendant's Reply in Support of Motion to Dismiss the Superseding Indictment, Or in the Alternative for Disqualification (*in camera*)
- Defendant's Opposition to Government's Motion Contesting the Application of Privilege (*in camera*)
- *In camera* Exhibit V
- *In camera* Exhibit W
- *In camera* Exhibit X
- *In camera* Exhibit Y
- *In camera* Exhibit Z
- *In camera* Exhibit AA
- *In camera* Exhibit BB
- *In camera* Exhibit CC
- *In camera* Exhibit DD

Defendant brings this motion pursuant to LR 49.1(d)(1)(A) to seal because the above-listed documents contain information that Mr. Adams contends is protected by the attorney-client privilege and/or attorney work product doctrine that should not be

revealed to or accessed by the government or the public. Unless and until this Court determines that some or all of these materials are not protected by the attorney-client privilege or the work product doctrine, neither the government nor the public should have access to these materials in their unredacted form. To allow such access may effectively constitute a waiver of the attorney-client privilege or work product protection and may defeat the purpose of Mr. Adams's continued assertion of privilege over these materials.

Dated: August 17, 2018

Respectfully submitted,

/s/ Gloria K. Maier

Joseph G. Petrosinelli (DC Bar #434280)
Lance Wade (DC Bar #484845)
Gloria Maier (DC Bar # 1012208)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
jpetrosinelli@wc.com
lwade@wc.com
gmaier@wc.com

James L. Volling (#113128)
Deborah A. Ellingboe (#26216X)
FAEGRE BAKER DANIELS LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55420
Telephone: (612) 766-7000
Facsimile: (612) 766-1600
james.volling@faegrebd.com
debbie.ellingboe@faegrebd.com

Attorneys for Defendant Edward S. Adams